

EXHIBIT D

From: [Cottreau, Steven \(Litigation-WAS\)](#)
To: [Carter, Sean](#)
Cc: rhaefele@motleyrice.com; juanmorillo@quinnemanuel.com; [Barlow, Katie \(Litigation-WAS\)](#)
Subject: Re: Call
Date: Wednesday, April 19, 2017 4:48:44 PM

Sean,

We would be happy to do so if the agreement is reciprocal so that you do the same, and we can go forward as planned in 2 weeks. We propose that the two sides exchange documents and topics by email at the end of next week.

Best,
Steve

On Apr 19, 2017, at 4:42 PM, Carter, Sean <SCarter1@cozen.com> wrote:

Steve – Would you be willing to identify the subject matter areas you intend to cover in the proposed deposition, and to identify in advance any documents you intend to use? Thanks, Sean



Sean P. Carter

Member | Cozen O'Connor

One Liberty Place | 1650 Market Street, Suite 2800 | Philadelphia, PA 19103

P: 215-665-2105 F: 215-701-2105

[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | cozen.com

From: steve.cottreau@cliffordchance.com [<mailto:steve.cottreau@cliffordchance.com>]

Sent: Wednesday, April 19, 2017 2:37 PM

To: Carter, Sean <SCarter1@cozen.com>

Cc: rhaefele@motleyrice.com; juanmorillo@quinnemanuel.com; Katie.Barlow@CliffordChance.com

Subject: RE: Call

Yes. Let's use this dial in:

United States : +1-866-592-5236

Conference code: 6107700891

From: Carter, Sean [<mailto:SCarter1@cozen.com>]

Sent: Wednesday, April 19, 2017 14:28

To: Cottreau, Steven (Litigation-WAS)

Cc: Haefele, Robert

Subject: Call

Steve – Received your voicemail. Can Bob Haefele and I call you at 3?

Sean P. Carter

Member | Cozen O'Connor

One Liberty Place | 1650 Market Street, Suite 2800 | Philadelphia, PA 19103



P: 215-665-2105 F: 215-701-2105

[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

[CC]New[/CC]

This message and any attachment are confidential and may be privileged or otherwise protected from disclosure.

If you are not the intended recipient, please telephone or email the sender and delete this message and any attachment from your system. If you are not the intended recipient you must not copy this message or attachment or disclose the contents to any other person.

Clifford Chance as a global firm regularly shares client and/or matter-related data among its different offices and support entities in strict compliance with internal control policies and statutory requirements.

Incoming and outgoing email communications may be monitored by Clifford Chance, as permitted by applicable law and regulations.

For further information about Clifford Chance please see our website at <http://www.cliffordchance.com> or refer to any Clifford Chance office.

Switchboard: +1 202 912 5000

Fax: +1 202 912 6000

To contact any other office http://www.cliffordchance.com/people_and_places/people.html

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-

public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.